N.B. On September 30, 2024, Eastern Power informed the Impact Assessment Agency of Canada that this draft Response to Summary of Issues is deemed final

IAAC – Hydrogen Ready Power Plant Project – Summary of Issues

This document provides a high-level summary of the issues submitted to the Impact Assessment Agency of Canada (the Agency) on the Hydrogen Ready Power Plant Project (the Project) during the comment period on the Initial Project Description submitted by the Eastern Power Inc. (the Proponent). The issues highlight the information needed to support the Agency's decision on whether an impact assessment is required under section 16 of the *Impact Assessment Act* and— if an assessment is required — to inform the planning phase documents and further assessment. Original submissions are posted on the Canadian Impact Assessment Registry (Reference Number #83696). Categories of issues are listed in alphabetical order.

The Detailed Project Description must contain the information from the Initial Project Description in addition to the necessary information provided in response to the Summary of Issues. This necessary information should be included in the main body of the Detailed Project Description, and not just in appendices to facilitate understanding by participants, including the public and Indigenous communities.

Accidents and Malfunctions	**Response**
Need for more information on accidents and malfunctions (i.e. spills, fires, and explosions), and associated mitigation measures and safeguards.	Section 4.4.9 Public Health and Safety has been revised to include sub section 4.4.9.2 Accidents, Malfunctions and Mitigation: The HRPP facility will have several features that limit or minimize the possibilities of spills, fires, and explosions. Major equipment such as turbines and transformers will have barriers built around them to prevent leaks from entering water courses. These areas will be connected to an on-site oil separator to collect, store and separate out any fluid leaks. All turbines, generators, and transformers will be equipped with fire suppression systems and all enclosed areas would have monitoring equipment for gas or liquid leaks, fires and smoke. The facility distributed control system will be equipped to automatically shut down and isolate equipment in case of a fire as well as to trigger automatic fire suppression system activation. These permanently installed systems, together with the emergency response procedures described below, will limit possibilities of any uncontrolled release of substances or risks of fire and or explosions. The HRPP Project will include a comprehensive Emergency Preparedness and Response Plan (ERPP) similar to the one in place for the ongoing GEPP project and as approved by the IESO. This ERRP will detail the management, reporting, response, mitigation and follow-up for all potential emergency events, accidents and malfunctions that could have health and safety

	impacts to HRPP personnel, outsourced workers, visitors and the general public, as well as to the natural environment.
Acoustic Environment	
Comments that emphasized the potential impacts of construction noise on human health.	Section 4.1.1 Air Quality and Noise has been revised to include: **<u>Construction Noise and Mitigation</u>** Construction noise arises from the use of construction equipment for earth moving, grading, material handling, cranage, etc. As per Appendix 7.3 Noise Impact & Mitigation Study, the background sound "was dominated by road traffic on Oil Springs Line and Highway 40 during the daytime hours and to varying degrees during the evening" and the study concluded that the applicable MECP limits for the daytime and nighttime operation are 50 dBA and 45 dBA, respectively. Therefore, construction hours will be during the daytime hours of 7:00 am to 4:00 pm to minimize noise disturbances to the nearby residential houses. For health and safety at the construction site, the construction equipment/vehicles will be well maintained providing low noise emissions. Moreover, all construction equipment/vehicles will not be left idling when not in use. In addition, noisier episodic construction phase noise (example, foundations pile driving) will be further mitigated by limiting such noisier aspects of construction to daytime periods to lessen impacts to HRPP project neighboring residents. These noisier aspects of construction are limited and of relatively short duration and, potentially affected local residents will be informed of these well in advance. Any other noise emission activities will also be done during these day time hours. The additional noise emissions will be insignificant due to the distance (about 750 m) to the nearest residential dwelling and given the existing ambient sound level, which is dominated by the road traffic on Oil Springs Line and Highway 40 and the nearby CN Railway, running north/south, parallel to the proposed HRPP site. All construction equipment will be equipped with sound mufflers which will prevent noise-induced hearing loss to equipment operators. To substantiate the above, an operational and construction noise assessment has been completed, in accordance with Health Canada's "Guidance

for Evaluating Human Health impacts in Environmental Assessment: Noise". The baseline and operational noise levels (daytime and nighttime) at each receptor were taken from HGC's Noise Impact & Mitigation Study (see Appendix 7.3). Since the construction time is expected to be 2 to 2.5 years in length, the construction noise level was assumed to be the same as the daytime operational noise level. An adjustment of + 10 dB was not considered for both the baseline and construction/operational scenarios, since the proposed project location is not considered as a rural area (see HGC's Noise Impact & Mitigation Study, Appendix 7.3). Table 11 below, shows the baseline, operational and construction noise level and the %HA (percent highly annoyed) and the %HA change at each receptor. The analysis showed that the %HA change is below the suggested mitigation level of 6.5%.

The World Health Organization's "Guidelines for Community Noise" recommends an indoor 45 dBA LAmax sound pressure level, for individual noise events and 30 dBA LAeq for continuous noise events to minimize sleep disturbances. The nighttime operation noise level at each receptor is no more than 43 dBA (see Appendix 7.3 Noise Impact & Mitigation Study). According to Health Canada, it is assumed that "an outdoor-to-indoor transmission loss with windows at least partially open is 15 dBA" and for fully closed window is about 27 dBA. To date, there have been no noise complaints from the operation of the existing Green Electron Power Plant during the evening and nighttime hours. The construction of the propose HRPP will be done during the daytime (7:00 am to 4:00 pm) Therefore, the construction and operation of the proposed HRPP will not cause noise sleep disturbances.

Although there could possibly be future projects in the area that potentially affect human health, these future projects would have to comply with the applicable provincial and federal regulations, and municipal by-laws, to minimize the health impact from noise related emissions.

Alternatives Assessment (including Alternatives to the Project and Alternative Means)	
Need for information on the feasibility and cost effectiveness of alternatives to the Project, such as battery storage from renewable energies (i.e. solar, wind) and fuel cells.	Section 2.4 Alternative Designs /Justification for Selection of Preferred Design has been revised to include: 2.4.5 Cost of Technology Eastern Power Inc. intends to offer the HRPP facility as a source of high value, flexible generation to meet Ontario's identified emerging system needs starting in 2025. IESO requires the new generation capacity to be dispatchable with load-following capability with a minimum of 8 hours of energy duration to meet resource adequacy needs identified in the 2022 Annual Acquisition Report (AAR) published by the IESO. The AAR identifies flexibility with a large operating range, capability to ramp up and down quickly, and ability to provide ancillary support such as operating reserve, reactive support, and voltage control. All these are characteristics of combined cycle power generation technology. While Eastern Power cannot comment on IESO's procurement mechanism, it is expected to be cost competitive, generally technology agnostic and result in a mix of resources including wind, solar, storage, and combined cycle gas that will ensure that IESO meets their reliability obligations. Determining the cost competitiveness of the projects proposed by various proponents under IESO's procurement mechanism is IESO's mandate and decision. Eastern Power is a privately owned business, funded by private equity and commercial debt, and is competing with other prospective suppliers to be potentially contracted by IESO and as such cannot share commercially sensitive pricing information. Placing such pricing information in the public domain could impair Eastern Power's ability to successfully bid on and finance the project.
Atmospheric Environment (e.g. air quality, vibrations)	

Need for more information on potential effects of the Project on air quality during construction and decommissioning phases. Need for further details on the proposed mitigation measures and monitoring plans to address impacts to air quality.	The following has been added to 4.1.1 Air Quality and Noise: **<u>Construction and Decommissioning</u>** Eastern Power has further assessed the potential HRPP project emissions and their potential cumulative impacts to current ambient air quality both near to the HRPP project and in the broader >20km region surrounding the HRPP project. During the construction and decommissioning phases of the proposed HRPP, the major pollutants to be expected are oxides of nitrogen, carbon monoxide, sulphur dioxide, particulate matter (PM, PM10, PM2.5) and VOCs from the fuel combustion of construction equipment and other vehicles. These vehicles include, but are not limited to, earth moving, material handling and cranage. Generally, there will be 10 construction vehicles running at any one time, with a minimum of about 3 vehicles. There will also be an increase in vehicular traffic in the project area due equipment and construction supply deliveries to the site. These are estimated to be about 15 deliveries per week. These additional emissions will occur during weekdays, generally from 7:00 in the morning to 4:00 in the afternoon, during the 2 to 3 years of construction. The decommissioning phase (3 to 4 months) will be similar to the construction phase in terms of air emissions. The difference would be the number of decommissioning vehicles, which is expected to be half of number during the construction phase. Table 9 lists the possible pollutants that could be released during the construction and decommissioning phase of the project. The listed pollutants were taken from the latest EPA WebFIRE, under the following sub-categories: Level 1: Internal Combustion Engines, Level 2: Industrial, Level 3: Distillate Oil (Diesel) and Level 4: Reciprocating. Note that these pollutants are emitted from stationary internal combustion engines. As shown in Table 9, NO_2, SO_2, CO and PM are the significant pollutants (PM was assumed to be PM2.5). Since NO_2, SO_2 and PM2.5 are included in the CAAQS and are the most significant pollutants, these pollutants were used for the air impact analysis. The EPA emissions factor for PM2.5 was used. For NO_2, the Air Pollutant Emission Performance for the 2019 Model Year On-Road Vehicle

Fleet report was used, using the average Class 3 vehicles of 0.44316 g/mile of NO_2. For SO_2, it was assumed that all sulfur content in the diesel fuel reported as SO_2, using the federal regulated maximum sulfur content of 15 mg/kg. All of the emission estimate calculations are based on the known total diesel fuel usage for the construction of the Green Electron Power Plant, prorated to the estimated timeline for the construction and decommissioning of the HRPP facility.

Additional dispersion modeling has been completed in accordance with the MECP Guideline A-11 "Air Dispersion Modeling Guideline for Ontario, Version 3.0". The MECP Sarnia Monitoring Station (14111) was used for the ambient NO_2, SO_2, and PM2.5 concentration levels. This closest monitoring station is about 23 km north of the site. The results are included in Table 10 below for both the construction and decommissioning phase of the project. Table 10 compares the maximum concentration of NO_2, SO_2, and PM2.5 to the CAAQS criteria. It was assumed that all particulate matter emitted from the construction equipment/vehicles will be PM2.5. Table 10 shows that the concentrations for all pollutants directly emitted from the construction/decommissioning vehicles are below the CAAQS criteria. Since the existing ambient levels for NO_2 is already close to the CAAQS of 83 µg/m^3, the worst case combined effect for the construction phase will be around 10 µg/m^3 above the guideline limit but this potential exceedance is both small and of short duration. All the other pollutants for the combined effect fall below the CAAQS for both the construction and decommissioning phases of the HRPP.

Construction and Decommissioning – Air Quality Monitoring and Proposed Mitigation

Considering that the expected direct emissions from both the construction and decommissioning phase of the project are small and are within the CAAQS criteria, the existing MECP monitoring stations will be used during the construction and decommissioning phases of the project to monitor potential air impacts.

	Construction equipment are typically well maintained for both health and safety reasons and will not be left idling when not in use. These precautions will minimize combustion emissions to the air. Dust is also one of the potential air emissions. Following standard practices in construction/decommissioning, dust emissions will be minimized by wetting the ground surfaces.
Need for more information on air quality for the 100% hydrogen scenario, with consideration of increasing nitrogen dioxide emissions as the Project progresses towards 100% hydrogen. Need for information on any additional mitigation measures that may be required.	The following has also been added to 4.1.1 Air Quality and Noise: While NO_2 emissions will increase as hydrogen progressively replaces natural gas to 100% hydrogen, i.e., due to formation of thermal NOx with the higher hydrogen combustion temperatures in the turbines, only NOx will increase with hydrogen use. The expected products of combustion are water, NO_x (mainly NO_2) and excess oxygen. While the turbine manufacturer has not yet published NO_2 emission values for 100% Hydrogen usage, Eastern Power has estimated the NO_2 emissions to be about 30 ppmv, based on the known emissions for both 20% (15 ppmv NO_2) and 65% (25 ppmv NO_2) H_2. Additional analysis has shown that the project alone NO_2 maximum 1-hour concentration at the closest receptor (749 m northeast) is an estimated 81.3 ug/m^3, which is below the CAAQS of 83 ug/m^3. Since the baseline concentration level (measured at the MECP Sarnia monitoring station) is close to the NO_2 CAAQS, the cumulative concentration is above the CAAQS. However, with using the more project-relevant CASA Aamjiwnaang monitoring station ambient air quality data, the cumulative effect is reduced and these cumulative NO_2 emissions will remain below MECP regulatory maximum POI concentrations. To minimize the increase in NO_2 emissions, the GE 7FA gas turbine will be equipped with the proven technology (best technology available) of Low NOx Burners.
Comments regarding potential impacts of air emissions from the Project to wildlife and vegetation, including ground-level ozone, volatile organic compounds, polycyclic aromatic hydrocarbons and particulate matter.	The following has been added to 4.1.6 Vegetative Communities: Eastern Power has further assessed the potential HRPP project emissions and their potential impacts including on vegetation. Including from cumulative impacts to current ambient air quality

	both near to the HRPP project and in the broader >20km region surrounding the HRPP project. From these additional analyses it can be concluded that the HRPP Facility will not negatively impact vegetative communities from ambient air quality with respect to VOCs, NOx, PM, CO or ozone. The Ontario Ministry of the Environment, Conservation and Parks (MECP) has published the Air Quality in Ontario 2019 Report. This report includes a 10-year trends (2010 to 2019, inclusive) of NOx, PM2.5, ground level O_3, and VOCs. Within this 10-year period, the Greenfield Energy Center, the St. Clair Energy Center and the Green Electron Power Plant were placed on line. For ground level ozone, the report shows no significant trends (i.e., increasing or decreasing) in the annual and seasonal ozone means over the past 10 years, as recorded in the MECP Sarnia monitoring station. For VOCs, the MECP Sarnia monitoring station recorded a decreasing trend in the 10-year period. Similarly, PM2.5 has decreased in the same 10-year period. Considering that three combined gas natural gas power plants in the Courtright area were placed on line within this 10-year period and the historical emissions data show a stable (O_3) and decreasing trend (VOCs and PM2.5), the proposed HRRP power plant will have a negligibly small potential impact to vegetation. The emissions of polycyclic aromatic hydrocarbons (PAHs) are 0.00086 g/s for 100% natural gas and 0.00030 g/s for 35:65 natural gas-hydrogen gas fuel mixture (emissions factors taken from the EPA WebFIRE) and a potential of zero emissions with 100% hydrogen gas. These emissions are 5 orders of magnitude less as compared to the primary emissions of NOx, CO, PM, and SO_2 (zero in the case for the HRPP) from the combustion of natural gas. With such insignificant PAHs emission rate and with the use of 100% hydrogen, the potential impacts of PAHs to vegetation would be negligible. The following has added to 4.1.7 Wildlife:

	Eastern Power has further assessed the potential HRPP project emissions and their potential impacts including on wildlife. Including from cumulative impacts to current ambient air quality both near to the HRPP project and in the broader >20km region surrounding the HRPP project. From these additional analyses it can be concluded that the HRPP Facility will not negatively impact wildlife from ambient air quality with respect to VOCs, NOx, PM, CO or ozone. The Ontario Ministry of the Environment, Conservation and Parks (MECP) has published the Air Quality in Ontario 2019 Report. This report includes a 10-year trend (2010 to 2019, inclusive) of NOx, PM2.5, ground level O_3, and VOCs. Within this 10-year period, the Greenfield Energy Center, the St. Clair Energy Center and the Green Electron Power Plant were placed on line. For ground level ozone, the report shows no significant trends (i.e., increasing or decreasing) in the annual and seasonal ozone means over the past 10 years, as recorded in the MECP Sarnia monitoring station. For VOCs, the MECP Sarnia monitoring station recorded a decreasing trend in the 10-year period. Similarly, PM2.5 has decreased in the same 10-year period. Considering that three combined gas natural gas power plants in the Courtright area were placed on line within the 10-year period and the historical emissions data show a stable (O_3) and decreasing trend (VOCs and PM2.5), the proposed HRRP power plant will have a negligibly small potential impact to wildlife. The emissions of polycyclic aromatic hydrocarbons (PAHs) are 0.00086 g/s for 100% natural gas and 0.00030 g/s for 35:65 natural gas-hydrogen gas fuel mixture (emissions factors taken from the EPA WebFIRE) and a potential of zero emissions with 100% hydrogen gas. These emissions are 5 orders of magnitude less as compared to the primary emissions of NOx, CO, PM, and SO_2 (zero in the case for the HRPP) from the combustion of natural gas. With such insignificant PAHs emission rate and with the use of 100% hydrogen, the potential impacts of PAHs to wildlife would be negligible.

Climate Change and Greenhouse Gas Emissions (GHGs)	
Need for description of commitments that have been or will be made with hydrogen suppliers and contingencies for hydrogen supply delays.	The following has been added to 2.4.4 Comparison of Power Generation Technologies: Eastern Power has made substantial financial investment to date with the design of the HRPP facility and for the sourcing of advanced hydrogen-ready combustion turbine technology in order for HRPP to be able to use hydrogen both upon initial facility start-up and progressively throughout the project life. Eastern Power is committed to using hydrogen as it becomes commercially available to HRPP. Eastern Power as an energy user and not an energy supplier has correspondingly used relatively conservative estimates as to the timing of availability of hydrogen fuel over the project life. Additionally, Eastern Power has made the additional conservative estimate of using only blue hydrogen over the entire project lifetime as this can now be made available using existing proven technologies (ATR with CCS). Strong federal financial incentives (carbon emission tax) are in place to encourage transition to clean fuel options. In addition, recent federal initiatives to accelerate the move to the hydrogen energy platform are expected to positively advance earlier hydrogen availability to HRPP. Noteworthy here is Canada's recent agreement with Germany to produce domestic green hydrogen for export to Germany for its use in electrical power production. This advance can be expected to accelerate domestic hydrogen availability to HRPP, including the proving of green hydrogen technologies. As an early adopter of hydrogen for electrical power production, Eastern Power's investment in HRPP will assist the development of hydrogen energy use.
Comments related to the potential for hydrogen to be sourced from production technologies that produce high GHG emissions.	Section 2.4.4 Comparison of Power Generation Technologies has been revised to include: Eastern Power has made the conservative estimate of using only blue hydrogen over the entire project lifetime as this can now be made available using proven existing technologies (ATR with CCS). Strong federal financial incentives (carbon emission tax) are in

	place. In addition, recent federal initiatives to accelerate the move to the hydrogen energy platform are expected to positively advance earlier hydrogen availability to HRPP. Noteworthy here is Canada's recent agreement with Germany to produce domestic green hydrogen for export to Germany for its use in electrical power production. This can be expected to accelerate domestic hydrogen availability to HRPP, including the proving of green hydrogen technologies. As an early adopter of hydrogen for electrical power production, Eastern Power's investment in HRPP will assist the development of hydrogen energy use. The future use of green Hydrogen will further reduce and ultimately eliminate GHG emissions from the HRPP project.
Need for more information on how the schedule for conversion from natural gas to hydrogen will be adhered to so as not to impede Canada's ability to achieve its 2030 and 2050 GHG targets.	Section 4.1.2 Climate Change Impact has been revised to include: As Canada's and Ontario's Hydrogen Strategy evolves, the use of existing transmission and distribution pipeline systems will be critical to distributing hydrogen to users. By encouraging use of hydrogen fuel as part of Canada's plan for 2030 and 2050 targets, Canada will enjoy a critical advantage to all G7 nations in achieving those targets. The cheapest solution to achieving the 2030 and 2050 targets include hydrogen as a major fuel and utilizing the existing infrastructure such as pipelines will be part of this. Canada's recent agreement with Germany to produce domestic green hydrogen for export to Germany for its use in electrical power production is noteworthy. This can be expected to accelerate domestic hydrogen production availability to HRPP and other potential users as well as fostering the development of green hydrogen technologies. Eastern Power has made conservative estimates for hydrogen availability and using only blue hydrogen over the entire project lifetime as this can now be made available using proven existing technologies (ATR with CCS). Strong federal financial incentives (carbon emission tax) are in place. These recent federal initiatives will accelerate the move to the hydrogen energy platform and can be expected to positively advance earlier hydrogen availability to HRPP. In this regard HRPP will not impede achieving Canada's GHG reduction targets but

	HRPP and similar projects will provide part of the means for achieving these reduction targets.
Need for more information on how the Project will meet Canada's commitment for a net-zero electricity grid by 2035. The current estimates for GHG emissions from the Project exceed net-zero beyond 2035.	Section 4.1.2 Climate Change Impact has been revised to include: Hydrogen platform development will foster development and the proving of green hydrogen production technologies thereby furthering development of renewable energy technologies all of which will help Canada meets its GHG reduction targets.
Cumulative Effects	
Comments related to potential cumulative effects from the Project in combination with existing or planned projects (e.g. transmission lines, manufacturing and production plants, natural gas pipelines) on human health, social and economic conditions, and the biophysical environment.	Additional text added to 4.1.1 Air Quality and Noise : Eastern Power has further assessed the potential HRPP project emissions and their potential impacts including on human health, social and economic conditions, and the biophysical environment. Including cumulative impacts to current ambient air quality both near to the HRPP project and in the broader >20km region surrounding the HRPP project. From these additional analyses it can be concluded that the HRPP Facility will not negatively impact ambient air quality with respect to VOCs, NOx, PM, CO or ozone. The use of hydrogen compared to natural gas will also result in reduced CO_2 and CO_2 (equiv) GHGs progressively over its expected 25-year life. The direct availability of gas transmission pipelines already on the project land and the immediately adjacent high voltage transmission system for direct connection to the transmission grid also avoid potential impacts by avoiding the need to add new energy supply and electrical output distribution lines.
Economic Conditions	
Comments regarding hiring strategy, including implementation of hiring practices to promote and support diversity and inclusion.	Section 4.4.7 Labour Supply and Employment has been revised to include: Eastern Power will continue to promote and support workforce diversity for its project employment opportunities with respect to educational and work experience background requirements and, openness to diverse ethnic, religious, cultural, gender and sexual orientation backgrounds. Additional details on needs and hiring strategy are provided in sections 4.4.7.1 through 4.4.7.6 below.

	4.4.7.1 Socio-Economic Growth and Job Creation Eastern Power Inc. and its affiliates employs a wide variety of skilled professionals, including professional engineers, management and finance professionals, TSSA licensed operating engineers in the regular operation and maintenance of its power generating facilities. The development and engineering phase of a power generation facility requires licensed professional engineers, managers, community outreach professionals, and specialists who are trained and experienced in detailed design and drawings, development of specifications, sourcing and procurement of turbines, generators, transformers, high voltage electrical switching equipment, pumps, structural steel, concrete, reinforcement steel and other miscellaneous parts and equipment. Construction phase of the project requires employment of construction trades such as heavy machinery operators, crane operators, pipefitters, boilermakers, electricians, structural steel workers/welders, concrete installers. These trades are unionised and typically belong to the ICI sector of the construction industry and are drawn from the local union halls. The union halls source these trades, giving preference to the local members. In the event of a shortage of any of the skilled trades, the union halls approach neighboring union jurisdictions such as London, Windsor or Chatham for additional tradespeople (Travellers) who typically commute on daily basis. With some of the major on-going construction work expected to grind down in 2023, HRPP anticipates that most of the skilled trades can be sourced from the Sarnia Lambton area. 4.4.7.2 Engineers and Designers Professional engineers and designers typically are involved in the preliminary and detailed design of the plant layout, sizing of structural steel and concrete foundations, various studies such as noise and emission studies, short circuit studies, equipment sizing, and development of detailed drawings that are used in construction. Engineering skills and learned through a minimum of 4 years in an accredited university, followed by several years of on-the-job training. In Ontario, professional engineers are licensed by the provincial licensing authority, the Professional Engineers Ontario (PEO). All the engineering professionals have

	several years of experience; with a substantial number of them having advanced graduate and doctoral degrees. A typical project engineering team will consist of experienced professionals supported by new engineering graduates (Engineers in Training, EIT) and interns. 4.4.7.3 Management and Finance Professionals Management professionals come from a variety of background and experience in developing and managing projects and come with advanced degrees in management and business administration. Typically, they are involved in project development, contracting, sourcing and securing financing, budgeting and project controls and management. 4.4.7.4 Construction Trades Concrete and brick layers, structural steel workers, carpenters, crane and heavy machinery operators, pipefitters, boilermakers and electricians are employed during various phases of the project construction. These skilled trades begin as apprentices after their high school graduation and over a period of several years attain the skills and certification required to perform their jobs. Several of these trades are licensed and regulated in provincial regulatory agencies in Ontario. The construction trades are typically employed for some or all of a project duration and move on to other projects on completion of their work. 4.4.7.5 Plant Operating Engineers Plant Operating Engineers are full time employees who are licensed by the Technical Standards and Safety Authority to operate and maintain power generation and continuous process facilities. They go through several years of studies in colleges and apprenticeship on the job to attain the skills and class certification required. For the proposed HRPP, First Class, Second Class and Third Class TSSA Certification is required to operate and maintain the power generation facility. 4.4.7.6 HRPP Project Staffing Plan As discussed above, most jobs of this nature require qualifications and experience that are gained over several years of schooling,

	university followed by apprenticeship and or internships before a person is licensed to work independently. Each member of Eastern Power's lead engineering and management team is in place and has several years of independent work experience and is a microcosm of the United Nations with staff drawn from several countries across the globe with 65% being visible minorities who immigrated to Canada in the previous years and 20% being immigrant women. Eastern Power plans to approach Ontario based universities, local communities, First Nations, and other interest groups when engineering job vacancies open-up in mechanical, civil and electrical engineering fields. Such medium-term project jobs will require between 15- 20 new engineers or interns and are expected to last for about 5 years over the course of engineering and construction of the project. These positions impart a wide variety of knowledge and skills to the new engineers and interns, including detailed design and drawing developments, engineering calculations, use of advanced software tools and development of interpersonal skills, providing valuable experience that will help advance future professional development. In the earlier recruitment for the Green Electron Power Project in 2012, the new recruits represented the full spectrum of Canadian diversity. Eastern Power proposes to follow the same successful approach for Hydrogen Ready Power Project as well. Construction trade jobs open-up when site excavation work begins and will last till the completion of construction and commissioning of the project. Construction staff are requested by the company, but the individuals that are sent are determined by the local union halls. Staffing levels at the project site will vary from a few at the start of the project to between 150-200 workers at the peak of the construction period. Staffing levels vary as the project construction progresses, with a typical staffing pattern starting with a few labourers, electricians, and heavy equipment operators. After a 3–4-month period, staffing will progressively increase from that point with several other trades such as iron workers, welders, carpenters, pipefitters and boilermakers being

	added to the work pool. The peak construction work pool will reach about 200 persons and remain at or near that level for approximately 16 months. The last four months of the construction period would be focused on start-up and commissioning of equipment and processes and this work would involve a smaller work pool of between 40-50 tradespeople. The staffing pattern for trades typically consist of several journeymen supported by apprentices. The apprentice programs offered by the unions provide a platform that can be leveraged by minorities and specified groups to get trained and seek fulfilling careers in the construction trades. Eastern Power would encourage the construction trade unions to offer training and apprenticeship programs to marginalized communities. Full time plant operations require that operators licensed by the TSSA operate, and manage the plant at all times. Eastern Power has an on-going program with Lambton College and other colleges in the neighborhood to provide opportunities for on- the-job training to the students in their Power Engineer's learning programs. Plant staff at the existing facility includes visible minorities and First Nations. Eastern Power proposes to continue to provide training opportunities to the students in the Power Engineer's program. Employment opportunities will be open to qualified candidates who are licensed by the TSSA. In summary, the HRPP Project will result in about 250 person years of construction employment as well as 25 skilled, full-time jobs once the plant is in operation. Given that Lambton County had total employment of about 62,000 and a total value of industrial construction of about $ 200 million in 2019, the impact of the project on local businesses will be positive and should not cause any distortions through shortages or surpluses in the labour markets of Lambton County, Ontario or Canada. Based on prior experience with the similar GEPP Project this is expected to include a number of workers from both the Walpole Island First Nation and the Aamjiwnaang First Nation both of which are <20km from the project site.

	Therefore, the Project will have no net negative impacts on labour supply and employment.
Engagement with Indigenous People	
Engagement activities must be respectful of Indigenous protocols. Need for information on Proponent's future engagement activities planned with Indigenous communities, including the sharing of Project materials, efforts to contact communities and requests for engagement (i.e. funding).	Section 5.6 Indigenous Consultations and Information Gathering has been revised to include: Continuing consultations through September 2022 with First Nations including WIFN, AFN, COTTFN, CKSPFN, CFN as well as Metis Nation Ontario (MNO) have included: provision of materials for review and comment, presentations to First Nation environmental committees; meetings with consultation managers including with their external consultants to review and respond to concerns raised, detailed responses to initial and subsequent concerns expressed, meetings to discuss concerns and responses provided and, provision by Eastern Power of appropriate capacity funding for First Nation review of project reports.
Comments on how issues raised by Indigenous communities were used to inform the development of the project design.	Section 5.3 Key Comments and Concerns by Indigenous Groups has been revised to include: Continuing consultations through September 2022 with First Nations including WIFN, AFN, COTTFN, CKSPFN and CFN as well as Metis Nation Ontario have been useful for further identifying a number of key concerns of First Nations. These concerns include cumulative impacts to existing air quality as to potential impacts to the natural environment and impacts to uses for traditional First Nation purposes especially within the Three Fires Confederacy traditional territory in which the project is located. These concerns informed additional studies and assessments for a range of potential air quality impacts over a broader geographical region of the traditional territory and an updating on the EIS with respect to its currency of potentially affected SAR and migratory birds, potential impacts to water quality and appropriate mitigation measures to be taken through all phases of project development.

Indigenous Peoples' Current Use of Lands and Resources for Traditional Purposes, and Exercise of Aboriginal and/or Treaty Rights	
Need for information about potential effects of Project on the Bickford Oak woods Conservation Reserve, as it relates to effects on current use of lands and resources for traditional purposes (e.g., hunting, trapping, gathering, accessing sacred spaces), and impacts on the exercise of Aboriginal and/or treaty rights, and associated mitigation measures.	Section 5.3 Key Comments and Concerns by Indigenous Groups has been revised to include: An updating of the project EIS has been made by Wood to ensure adequate mitigation measures for potential affects to Bickford Oak woods Conservation Reserve, as it relates to effects on current use of lands and resources for traditional purposes (e.g., hunting, trapping, gathering, accessing sacred spaces), and impacts on the exercise of Aboriginal and/or treaty rights. The updated EIS has also detailed the adequacy of mitigation measures to be implemented throughout the various project phases. The updated EIS has been added to Appendix 7.8. Given the technology to be utilized along with the implementation of the EIS-recommended mitigation measures , it can be concluded that the project will have no significant impacts on First Nations traditional territory as it relates to effects on current use of lands and resources for traditional purposes (e.g., hunting, trapping, gathering, accessing sacred spaces), and impacts on the exercise of Aboriginal and/or treaty rights, and associated mitigation measures.
Need for information on potential cumulative effects from the Project on Indigenous communities (air quality –methane emissions) and their exercise of Aboriginal and/or treaty rights.	Section 5.3 Key Comments and Concerns by Indigenous Groups has been revised to include: In responses to these concerns, Eastern Power has further assessed the potential HRPP project emissions and their potential impacts including on human health, social and economic conditions, and the biophysical environment. Including cumulative impacts to current ambient air quality both near to the HRPP project and in the broader >20km region surrounding the HRPP project. From these additional analyses it can be concluded that there will be no significant health risks or cumulative effects on health from the Project due to changes in air quality and contaminant exposure including for nitrogen dioxide and particulate matter

	emissions and exposure to ground-level ozone created from the reaction between nitrogen oxides released from the Project. From these additional analyses it can be concluded that the HRPP Facility will not negatively impact existing ambient air quality in the traditional territory of the Three Fires Confederacy of First Nations with respect to VOCs, NOx, PM, CO or ozone. From these additional analyses it can also be concluded that there will be no significant cumulative effects from the Project on Indigenous communities as to air quality and their exercise of Aboriginal and/or treaty rights.
Indigenous Peoples' Health and Well-being	
Comments regarding potential human health risks from changes in air quality, including contaminant exposure for which there is no safe level of exposure (i.e. nitrogen dioxide and particulate matter emissions), and exposure to ground-level ozone created from the reaction between nitrogen oxides released from the Project and sunlight.	Section 5.3 Key Comments and Concerns by Indigenous Groups has been revised to include: In responses to these concerns, Eastern Power has further assessed the potential HRPP project emissions and their potential impacts including on human health, social and economic conditions, and the biophysical environment. Including cumulative impacts to current ambient air quality both near to the HRPP project and in the broader >20km region surrounding the HRPP project. From these additional analyses it can be concluded that there will be no significant health risks or cumulative effects on health from the Project due to changes in air quality and contaminant exposure including for nitrogen dioxide and particulate matter emissions and exposure to ground-level ozone created from the reaction between nitrogen oxides released from the Project. From these additional analyses it can be concluded that the HRPP Facility will not negatively impact existing ambient air quality in the traditional territory of the Three Fires Confederacy of First Nations with respect to VOCs, NOx, PM, CO or ozone.

	From these additional analyses it can also be concluded that there will be no significant cumulative effects from the Project on Indigenous communities as to air quality and their exercise of Aboriginal and/or treaty rights.
Comments regarding potential effects of the Project on water quality, and the as sociated human health risks.	Section 5.3 Key Comments and Concerns by Indigenous Groups has been revised to include: An updating of the project EIS has been made by Wood to ensure adequate mitigation measures for potential affects to Bickford Oak woods Conservation Reserve, as it relates to effects on current use of lands and resources for traditional purposes (e.g., hunting, trapping, gathering, accessing sacred spaces), and impacts on the exercise of Aboriginal and/or treaty rights. The updated EIS has also provided mitigation measures to be implemented throughout the various project phases. The updated EIS has been added to Appendix 7.8 Similar to the construction phase of the GEPP, the proposed HRPP will use sediment/silt fences around the project construction site, adjacent to natural areas, to protect surface water quality during the construction and decommissioning phases of the project. These fences will be inspected regularly. The decommissioned site will be brought back to its natural condition. These fences will be in place until all the areas of the construction/decommissioning site have been stabilized. As detailed in Storm Water Management Study Report (Appendix 7.4), any precipitation falling outside the developed area will continue to drain as sheet flow overland to Government Drain #10 and storm water from the developed area (asphalt cover) will be collected in storm water catch basins and directed to the cooling tower basin where it will be consumed as part of the plant process. The area outside the developed area will be brought back to its natural condition, prior to the removal of the

	sediment/silt fencing. These measures will ensure minimal impacts to water quality and the associated human health risks.
Comments on the potential increase in gender-based violence towards Indigenous people, in particular women and girls, due to the influx of workers into the area.	Section 4.4.9 Public Health and Safety has been revised to include: Eastern Power is committed to a safe work environment ensuring the health and safety of all project personnel, visitors and the general public. Eastern Power has designed the project to minimize issues from ait and noise emissions as outlined in section 4.4.9.1 below. Eastern Power also has provisions in place to prevent and mitigate problems from accidents and malfunctions as outline in section 4.4.9.2 below. Eastern Power is also committed to workplace that is free of harassment, violence, and discrimination against project personnel, visitors and the general public as detailed in section 4.4.9.3 below. Also, a new section 4.4.9.3 discussing policies against violence and harassment and discrimination has been added. 4.4.9.3 Policies against Violence and Harassment and Discrimination The company's Health and Safety Policy affirms that it will not tolerate harassment, violence, or unacceptable interpersonal behaviour in the workplace perpetrated by or against employees, customers, clients, women, and indigenous peoples or other minorities. Each employee of the company will be required to be trained in this policy and accept this policy as a condition of employment. Compliance to these policies will be monitored by union stewards and enforced by Eastern Power management. HRPP recognizes and fully supports the right of individuals to pursue employment opportunities and benefits- regardless of gender- under the Employment Equity Act. Despite this, inequality, harassment and discrimination has persisted in the labour market.

Insights on Canadian Society defines workplace harassment "as objectionable or unwelcome conduct, comments, or actions by an individual, at any event or location related to work, which can reasonably be expected to offend, intimidate, humiliate or degrade. Harassment in the workplace comes in a variety of forms, as it can range from interpersonal mistreatment, such as disrespect, condescension and degradation, to more physical forms of harassment such as physical assault, sexual assault, bullying or the threat of harm".

Canadian Centre for Justice and Community Safety Statistics (Discrimination in Canadian Provinces) highlights the following:

- Just under half of workers have either witnessed or experienced some sort of inappropriate sexualized or discriminatory behaviour in a work-related setting
- Women are more likely to be targeted than men with sexualized behaviour in the workplace
- About 10% of the women and 4% of men experienced workplace discrimination based on their gender
- Almost half of women working in trades, transportation, equipment operations and related occupations experienced inappropriate behaviour in the workplace
- Among those targeted with discrimination based on actual or perceived gender, gender identity or sexual orientation, 44% of women and 36% of men identified someone in authority as responsible
- Inappropriate sexualized behaviours and gender-based discrimination at work are more common among young people, people with disabilities and LGBTQ2 people

While recognising that workplace harassment is a fact of life in Canada as in any other jurisdictions, HRPP's site will implement,

	train staff, and enforce policies that will not tolerate harassment, violence, or unacceptable interpersonal behaviour in the workplace perpetrated by or against employees, service providers, or third parties. Any incidence of harassment, violence or unacceptable interpersonal behaviour will be subject to severe company discipline, up to and including discharge for cause, removal from premises, prosecution under the Criminal Code, Human Rights Code, the Occupational Health and Safety Act, and other applicable laws and regulations. The project will set up procedures to report, investigate, and address at the appropriate disciplinary level any incidence of harassment.
Indigenous Peoples' Social and Economic Conditions	
Need for more information on the potential effects to economic conditions of local Indigenous communities, including positive (e.g. purchasing of goods and services from the communities, training and hiring of community members) and negative effects (e.g. impacts to traditional territory and to traditional economic and resource use near the project site).	Section 4.4.6 Economic Base of Community has been revised to include: Given that that the total value of industrial construction in Lambton County in 2019 was about $ 200 million, the impact of the project on local businesses will be positive and should cause no distortions from shortages or surpluses in the economic base of the community. The Sarnia economic area continues to include many service and supply companies appropriate to the HRPP project development and many of these same firms were and continue to be engaged for the ongoing GEPP project. In this regard both WIFN and AFN are in this immediate Sarnia economic service area and local band members are typically employed by these area firms. The HRPP project development is expected to provide similar positive economic and social benefits for First Nations in the local region of the HRPP project. Please refer to section 4.4.7.6 as below. 4.4.7.6 HRPP Project Staffing Plan As discussed above, most jobs of this nature require qualifications and experience that are gained over several years of schooling, university followed by apprenticeship and or internships before a person is licensed to work independently.

	Each member of Eastern Power's lead engineering and management team is in place and has several years of independent work experience and is a microcosm of the United Nations with staff drawn from several countries across the globe with 65% being visible minorities who immigrated to Canada in the previous years and 20% being immigrant women. Eastern Power plans to approach Ontario based universities, local communities, First Nations, and other interest groups when engineering job vacancies open-up in mechanical, civil and electrical engineering fields. Such medium-term project jobs will require between 15- 20 new engineers or interns and are expected to last for about 5 years over the course of engineering and construction of the project. These positions impart a wide variety of knowledge and skills to the new engineers and interns, including detailed design and drawing developments, engineering calculations, use of advanced software tools and development of interpersonal skills, providing valuable experience that will help advance future professional development. In the earlier recruitment for the Green Electron Power Project in 2012, the new recruits represented the full spectrum of Canadian diversity. Eastern Power proposes to follow the same successful approach for Hydrogen Ready Power Project as well. Construction trade jobs open-up when site excavation work begins and will last till the completion of construction and commissioning of the project. Construction staff are requested by the company, but the individuals that are sent are determined by the local union halls. Staffing levels at the project site will vary from a few at the start of the project to between 150-200 workers at the peak of the construction period. Staffing levels vary as the project construction progresses, with a typical staffing pattern starting with a few labourers, electricians, and heavy equipment operators. After a 3–4-month period, staffing will progressively increase from that point with several other trades such as iron workers, welders, carpenters, pipefitters and boilermakers being added to the work pool. The peak construction work pool will reach about 200 persons and remain at or near that level for approximately 16 months. The last four months of the

	construction period would be focused on start-up and commissioning of equipment and processes and this work would involve a smaller work pool of between 40-50 tradespeople. The staffing pattern for trades typically consist of several journeymen supported by apprentices. The apprentice programs offered by the unions provide a platform that can be leveraged by minorities and specified groups to get trained and seek fulfilling careers in the construction trades. Eastern Power would encourage the construction trade unions to offer training and apprenticeship programs to marginalized communities. Full time plant operations require that operators licensed by the TSSA operate, and manage the plant at all times. Eastern Power has an on-going program with Lambton College and other colleges in the neighborhood to provide opportunities for on- the-job training to the students in their Power Engineer's learning programs. Plant staff at the existing facility includes visible minorities and First Nations. Eastern Power proposes to continue to provide training opportunities to the students in the Power Engineer's program. Employment opportunities will be open to qualified candidates who are licensed by the TSSA. In summary, the HRPP Project will result in about 250 person years of construction employment as well as 25 skilled, full-time jobs once the plant is in operation. Given that Lambton County had total employment of about 62,000 and a total value of industrial construction of about $ 200 million in 2019, the impact of the project on local businesses will be positive and should not cause any distortions through shortages or surpluses in the labour markets of Lambton County, Ontario or Canada. Based on prior experience with the similar GEPP Project this is expected to include a number of workers from both the Walpole Island First Nation and the Aamjiwnaang First Nation both of which are <20km from the project site. Therefore, the Project will have no net negative impacts on labour supply and employment.

Comments that emphasized the need for resources for local Indigenous Skills and Employment Training Service delivery providers to support an inclusive labour force.	Section 4.4.7 Labour Supply and Employment has been revised to include: The construction trades at the site will comprise of a mixture of skilled journeypersons, supported by apprentices. The apprentice programs offered by the local union halls in Sarnia are a productive pathway to achieve satisfying professional growth and opportunities for those who contemplate a rewarding career in industrial and construction trades (see sections 4.4.7.1 and 4.4.7.4 below). Eastern Power's earlier Green Electron Power Plant benefited from skilled indigenous tradespeople working at the site during construction. The operating staff in the ongoing operation phase also includes indigenous personnel working since the project commissioning. Eastern Power also expects additional employment opportunities for Indigenous Peoples through all phases of the HRPP project development. Eastern Power's affiliate continues to work with Lambton College to provide on the job training to the students of Lambton College in their Operating Engineer programs and continues to be supportive of skilled jobs training opportunities for Indigenous Peoples Eastern Power is committed to provide apprenticeship training, employment, and growth opportunities to members of the indigenous communities
Need for more information on baseline social and economic context and associated potential effects on local Indigenous communities' social and economic condition.	As above with revisions to 4.4.5 and 4.4.6
Indigenous Peoples' Spiritual, Physical, and Cultural Heritage	
Comments on potential project effects on archaeological, physical and cultural h eritage resources.	Section 4.5.2 Archaeological Resources has been revised to include:

	The site is not itself and has no buildings on it of significance from a heritage perspective as was determined through independent Site Heritage/ Archaeological Stage 1 and Stage 2 Assessments, concluding that the site did not contain physical and cultural heritage features or structures of historical or archaeological significance and there was no evidence of the use of the lands for any traditional indigenous group purposes. The study area consisted of cultivated agricultural field, and woodlot in the southernmost portion of the property. There were no topographic features but one possible relic watercourse present, indicating low to moderate pre-contact/contact First Nations settlement potential. Additionally, there were no Euro-Canadian records of evidence of settlement on the property. The Stage 1 archaeological assessment under Project Information Form (PIF) #P077-006-2012 (2013) and Stage 2 archaeological assessment under PIF #P077-008-2013 (2013) were reviewed, accepted and registered by MHSTCI. The project site has continued in uninterrupted use solely as an industrial site since2013, so these findings and conclusions remain valid. The Ministry of Heritage, Sport, Tourism and Culture Industries (MHSTCI) were consulted on the HRPP project, confirmed on Sept 1, 2021, and MHSTCI concluded, "Due diligence has been achieved as the Stage 2 archaeological assessment (Project Information Form Number: P077-008-2013) has been entered into the Ontario Public Register of Archaeological Reports indicating no further archaeological assessments are required for the study area."
Need for further information on how the Project would meet the requirements of Ontario Ministry of Tourism, Culture and Sport's *Criteria for Evaluating Potential for Built Heritage Resources and Cultural Heritage Landscapes* and associated mitigation measures in the event archaeological resources are uncovered during ground disturbing activities.	Section 4.5.2 Archaeological Resources has been revised to include: However, should archaeological resources be uncovered during ground disturbing activity, all activities impacting archaeological resources would cease immediately, and a licensed archaeologist will be required to carry out an archaeological assessment in accordance with the Ontario Heritage Act and the Standards and Guidelines for Consultant Archaeologists.

	If human remains are encountered, all activities will cease immediately, and the local police and coroner will be contacted. If the remains are associated with archaeological resources, MHSTCI would be notified at archaeology@ontario.ca, as any unlicensed alternations to an archaeological site are a contravention of the Ontario Heritage Act.
Migratory Birds	
Comments on the use of dated data on potential for birds to be present on the project site and surrounding area.	Section 4.1.7 Wildlife has been updated to include: An updating of the project EIS has been made by Wood to ensure adequate mitigation measures for potential effects on migratory bird nesting on the project site and in the surrounding area. The findings of the updated EIS (Appendix 7.8) conclude there will be no significant negative effects from the project on migratory birds.
Need for the Project	
Comments on the new Independent Electricity System Operator's procurement and mandatory requirements, and any implications to the Project.	Section 2.4.1 The Need has been updated to include: Eastern Power has reviewed the IESO procurement needs and its mandatory requirements for project proponents. Eastern Power meets these IESO requirements as summarized: 1. At least two designated team members with the experience in planning, developing, financing, constructing and operating of at least 1 Qualifying Large Scale Project: Eastern Power meets this criteria and this requirement will not have any implications for or impact on the project 2. Dispatchable/Market Participant status: Eastern Power intends to become dispatchable Market Participant prior to contract term commencement and hence no implications for the project 3. Duration of Service: Proposed facility must be able to provide at least 4 hours of continuous energy at Proponent's Contract Capacity during Qualified Hours: The proposed facility will be able to provide continuous energy without limitation on the number of hours

	4. Deliverability Assessment Status: Proponents to demonstrate attaining Deliverable or Deliverable but Competing status via the IESO deliverability assessment: Eastern Power will seek this assessment upon qualification and prior to award of contract and does not anticipate any problems 5. Site Control and Permitting: Proposal is able to demonstrate site access via site access declaration and associated documentation: Eastern Power has access and control of the site 6. Community Engagement: Proponent must develop and post a Community Engagement Plan; must hold 1 public meeting with each local community in which the project is proposed to be located: Eastern Power has carried out community and First Nation engagement and has a plan for ongoing engagement as part of the Environmental Assessment requirements of Ontario (O.Reg. 116/01) for electricity projects, i.e., as a category B project, under the Environmental Assessment Act (Ontario). 7. Indigenous/Municipal Support: Eastern Power has received a Municipal Council Support Resolution as the project is proposed to be located on land under municipal jurisdiction 8. On-Site Expansions, with new separately metered, registered and operated generation units (such as a new turbine installed on-site but not part of existing facility): To be dispatchable with load following capability (with a minimum of 8 hours of energy duration) to meet resource adequacy needs identified in the AAR; in-service date by May 1, 2025 and must participate in the same deliverability assessment as expedited procurement: Eastern Power does not anticipate any problems in meeting the 8 hour energy duration or the deliverability assessment. Meeting the in service deadline of May 1, 2025 will depend on the conclusion of the Federal EA process by fall of 2022
Project Activities and Design	

Need for clarification on whether the Project could impact the accessibility to known plugged or abandoned petroleum wells within the project site, and information on how the Project would meet the requirements of Ontario's *Oil, Gas and Salt Resources Act*.	Section 2.3.3 Project Life Phases has been revised to include: The overall GSPC property does contain one plugged and abandoned petroleum well but this is outside the project land and will not be affected during project development.
Comments regarding desire for local Indigenous communities to receive draft detailed project design drawings prior to issuance for construction.	Section 1.6.3 Province of Ontario Environmental Compliance Certificate has been revised to include: The Project is also regulated in terms of zoning and site plan by St. Clair Township under the Planning Act (Ontario) and the proponent will seek zoning and site plan approval in accordance with the Township's Official Plan through submission of site plans and required detailed project design drawings. Section 1.6.4 St. Clair Regional Conservation Authority has been revised to include: The Project will also be subject to use of the project lands as regulated by the Conservation Authorities Act (Ontario) in terms of impact on flooding, erosion and other watershed protection issues and this is expected to involve submission of site plans and required detailed project design drawings.
Public and Stakeholder Engagement	
Comments on planned engagement activities for local residents.	Section 6.1.2 Overview of Stakeholder Consultation Activities to date has been revised to include: Local neighbouring residents will be kept informed during the project development including the busier construction phase.
Species at Risk, Wildlife, and their Habitat	
Need for recent information on wildlife and the potential occurrence of species at risk within the project area. Need for information on potential adverse effects of the Project on wildlife, including species at risk and their critical habitat, and associated mitigation measures and monitoring plans.	Section 4.1.8 Species at Risk and Critical Habitat has been updated to include: An updating of the project EIS has been made to ensure all potential SAR have been identified and that adequate mitigation measures and monitoring plans are in place for implementation throughout all phases of project development to prevent potential impacts to SAR on the project site and in the

	surrounding area. This EIS update included the Woodland Area of Natural and Scientific Interest and the Bickford Oak Woods Conservation Reserve near to the project lands. The findings of the updated EIS (Appendix 7.8) conclude there will be no significant negative effects from the project on SAR.
Comments about potential adverse indirect effects to species at risk and their habitat (e.g., Clay Creek Woodland Area of Natural and Scientific Interest and Bickford Oak Woods Conservation Reserve).	Section 4.1.8 Species at Risk and Critical Habitat has been updated to include: An updating of the project EIS has been made to ensure all potential SAR have been identified and that adequate mitigation measures and monitoring plans are in place for implementation throughout all phases of project development to prevent potential impacts to SAR on the project site and in the surrounding area. This EIS update included the Woodland Area of Natural and Scientific Interest and the Bickford Oak Woods Conservation Reserve near to the project lands. The findings of the updated EIS (Appendix 7.8) conclude there will be no significant negative effects from the project on SAR.
Clarify any permitting requirements for project components located with the St. Clair Region Conservation Authority regulated area (Ontario Regulation 171/06).	Section 1.6.4 St. Clair Regional Conservation Authority has been updated to include: The Project will also be subject to use of the project lands as regulated by the Conservation Authorities Act (Ontario Regulation 171/06) in terms of impact on flooding, erosion and other watershed protection issues. This will likely include issuance of an SCRCA project development permit.
Water	
Comments on identification of mitigation measures that will be used during construction and operation to protect water quality in Government Drain #10, including their function and effectiveness.	Section 4.2.1 Fish and Fish Habitat (Fisheries Act) has been revised to include: Additional precautions have been considered and will be implemented during construction and operation to protect water quality in Drain #10. These additional measures include: • Silt/sediment fence around the construction site and adjacent to natural areas. The fence will be in place until the construction site area have stabilized

	• No in-water work activity is required for the construction and operation of the project and no explosives are to be used during construction • Project construction will not impact the vegetated buffer zones around Government Drain #10 • The overhead transmission interconnections for the project will be constructed outside of the riparian corridors of Drain #10 Given these measures the project will have no significant impacts on fish habitats in Government Drain #10 or outside the Project lands and will therefore not impact traditional fishing and hunting activities.
Comments raised regarding potential for contaminants from construction fill to adversely affect water quality in Government Drain #10.	Section 4.1.4 Surface Water Quality, Sedimentation and Groundwater Quality has been revised to include: Similar to the construction phase of the GEPP, the proposed HRPP will use sediment/silt fences around the project construction site, adjacent to natural areas, to protect surface water quality during the construction and decommissioning phases of the project. These fences will be inspected regularly. These fences will be in place until all the areas of the construction/decommissioning site have been stabilized. It is expected that no construction fill will be imported to site, based on the amount of excavation to be done during construction. The excavated material will be either used on site for landscaping or be exported to off-site users of clean excavated fill material. Prior to exporting excavated fill material, the material will be tested for potential contaminants, documented and filed in accordance with Ontario, municipal laws/regulations. In the unlikely event that construction fill needs to be brought to site, it will be tested to confirm its freedom from regulated contaminants and will this be documented and filed, all in

	accordance with Ontario, municipal laws/regulations. With these precautions and the installation of silt/erosion fencing around the construction area (see Section 4.2.1) and with project development set well back away from Government Drain #10, water quality in Government Drain #10 will not be adversely affected.
Wetlands	
Need for information on potential direct and indirect effects of the Project on the function (e.g. biological, social, hydrological) of the Bickford Oak Woods Wetland Complex.	Section 4.1.8 Species at Risk and Critical Habitat has been revised to include: The findings of the updated EIS (Appendix 7.8) also support the conclusion there will be no significant negative effects from the project on critical habitats with respect to their biological, social, hydrological functioning in the Bickford Oak Woods Wetland Complex.